



CSDVRS, LLC

600 Cleveland Street, Suite 1000 – Clearwater, Florida 33755
VideoPhone: 727-431-9692 Voice: 727-254-5600 Fax: 727-443-1537

Via Email

April 11, 2013

Chairman Julius Genachowski
Commissioner Robert M. McDowell
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Federal Communications Commission
445 Twelfth St., SW
Washington, DC 20554

Re: TRS ORDER AND RFPs

Dear Chairman Genachowski and Commissioners McDowell, Clyburn,
Rosenworcel and Pai:

We would like to bring to the Commissioners' attention serious concerns that some of the circulating reforms to the Video Relay Service ("VRS") program will cause unnecessarily redundant and wasteful Telecommunications Relay Service ("TRS") Fund expenditures and detract from the quality of the consumers' VRS. We respectfully ask you to delay this Order.

Companies like CSDVRS (d/b/a ZVRS) have spent tens of millions of dollars building sophisticated platforms to handle a variety of interoperable video calls. Nevertheless the Commission is intent on proceeding with several Request For Proposals ("RFPs") which will duplicate what VRS providers have already built under Commission administered TRS funding. These initiatives are disconnected from what the VRS market already provides and what consumers demand. They are destined to fail to achieve the desired results and will result in a waste of public resources.

The Commission is intent on spending resources for the National Science Foundation to invest and engineer in the area of research and development even though the open market has succeeded in developing a robust range of innovative products which work well in VRS.

The circulating Order will result in the unnecessary and wasteful spending of TRS Funds on outreach although the VRS industry does this very well today. If any reform is needed in this area, the Commission can require providers to document their spending and correspondingly allocate a portion of the rate.

The circulating Order is badly misaligned with the objective of making the VRS market more contestable and less costly. The Order will disrupt innovation and the increased quality of services that we have experienced to date. There is no legitimate business reason the three largest VRS providers will use another operating platform when they have invested tens of millions of dollars to perfect their platforms.

There is a simple way to make VRS market more competitive and it can be done with a stroke of the Commissioners' pen rather than wasteful spending and unnecessary new administrative programs.

Instead, the Commission should create a default provider selection as was ordered several years ago but the rule currently waived regarding the portability of Customer Premise Equipment ("CPE"). This time the Commission should augment that Order by requiring VRS providers to sustain all features and functions of CPEs even when the number associated with the CPE is ported or the call routed to a different provider. Consumers have demanded the ability to independently use CPEs without any loss of functionality merely because they choose a different provider. This approach will save millions of dollars and create a dramatically more competitive VRS market. It would be a boon for consumer as this shifts focus on quality interpreting compared to the currently locked-in VRS market as a result of providers' controlling their CPEs and associated proprietary functions.

It is simple. It is a proven approach. It will lead to savings and true competition.

We ask that you delay this order and review this logical proposal rather than pursuing new untested approaches that few outside the Commission have said are good ideas.

We look forward to continuing to work with the Commission and relay stakeholders in accomplishing an efficient and effective VRS program for all. Please contact me at 727-254-5600 if I can assist with any questions.

Sincerely,

/S/

Sean Belanger
CEO

cc: Zachary Katz, Chief of Staff, Chairman Genachowski
Christine Kurth, Policy Director & Wireline Counsel, Commissioner McDowell

Angela Kronenberg, Wireline Legal Advisor, Commissioner Clyburn
Priscilla Delgado Argeris, Legal Advisor, Commissioner Rosenworcel
Nicholas Degani, Legal Advisor, Commissioner Pai